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Attorneys for Defendants, MTAG as Custodian for Alterna Funding I, L.L.C. and Alterna Funding I, L.L.C. and non-party ATCF REO HOLDINGS, L.L.C.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY VICINAGE OF TRENTON

IN RE:	CHAPTER THIRTEEN
Cedrick Goodman,	
Debtor,	Case Number 20-10683-mbk
Plaintiff,	
Cedrick Goodman,	Adv. No. 20-1162-mbk
V.	Judge: Hon. Michael B. Kaplan, U.S.B.J.
Defendant(s),	
MTAG as Custodian for Alterna	
Funding I, L.L.C. and Alterna	
Funding I, L.L.C.,	

NOTICE OF CROSS-MOTION FOR DISMISSAL OF COMPLAINT Hearing Date: September 23, 2020, 10:00 AM

PLEASE TAKE NOTICE that MTAG as Custodian for Alterna Funding I, L.L.C., Alterna Funding I, L.L.C., and ATCF REO HOLDINGS, L.L.C., have filed papers with the court, to dismiss the complaint.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to enter an order for the relief sought, or if you want the court to consider your views on the motion, then not later than seven days before the hearing date, you or your attorney must:

a. File with the Clerk of the United States Bankruptcy Court an answer, explaining your position at:

United States Bankruptcy Court
Clarkson S. Fisher, Sr. U.S. Court House
402 East State Street
Trenton, N.J. 08608

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it at least seven days before the hearing date.

- b. You must also mail a copy to the Movant's counsel (appearing above) and to the Trustee, as well as to any other party to this action:
- c. Attend the hearing scheduled to be held on: <u>September 23, 2020 at 10:00 AM</u> at the United States Bankruptcy Court, located at the above indicated Court address.
- d. Request oral argument in writing if you file a written response and want to be heard in person in connection with the motion.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Pursuant to D.N.J. L.B.R. 9013, the undersigned waives oral argument and consents to disposition on papers. A proposed form or Order is annexed.

Dated: August 31, 2020

/s/ Adam D. Greenberg
HONIG & GREENBERG, L.L.C.
By: Adam D. Greenberg
Attorneys for MTAG as Custodian
for Alterna Funding I, L.L.C.,
Alterna Funding I, L.L.C., and
ATCF REO HOLDINGS, L.L.C.